

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	Criminal No. 2:21-cr-00242-WSH
)	
vs.)	Filed Electronically
)	
ZACKARY WOZNICHAK,)	
)	
Defendant.)	The Honorable W. Scott Hardy

MOTION FOR CONTINUANCE OF STATUS CONFERENCE

AND NOW, comes the Defendant, Zackary Woznichak, by and through his attorney, Lee M. Rothman, Esquire and the law firm of Difenderfer, Rothman, Haber and Mancuso, and files this Motion for Continuance of Status Conference as follows:

1. Counsel for the Defendant entered his appearance in the present matter on December 6, 2023.
2. The above-captioned matter is currently scheduled for a Status Conference before this Honorable Court on March 18, 2024.
3. Counsel for Defendant and Assistant United States Attorney Jonathan Lusty have been engaging in negotiations to resolve this matter without a trial.
4. Both parties believe that a continuation of the Status Conference in this matter is necessary, and respectfully request a one hundred and twenty (120) day extension of time for the scheduling of a status conference.
5. AUSA Johnathan Lusty consents to this request.
6. The delay of time caused by this extension is excludable delay under the Speedy Trial Act 18 U.S.C. § 3161 et seq. as the ends of justice served by

granting this extension outweigh the best interest of the public and the defendant to a speedy trial, 18 U.S.C. § 3161 (h) (7) (A), since the failure to grant such extension would deny counsel for the defendant reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S. C. § 3161 (h) (7) (B) (iv).

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant him a one hundred and twenty (120) day extension of time within which to schedule a status conference in this matter.

Respectfully submitted,

s/ Lee M. Rothman

Lee M. Rothman, Esquire
PA I.D. No. 77445

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Dated: March 13, 2024

Attorney for Defendant, Zackary Woznichak